

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

*

v.

*

Criminal No. GLR-17-0631

NGHIA HOANG PHO

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* * * * *

**MOTION TO FILE MEMORANDUM IN SUPPORT OF
MOTION FOR COMPASSIONATE RELEASE UNDER SEAL**

The Defendant Nghia Pho, through her attorneys, James Wyda, Federal Public Defender for the District of Maryland, and Julie L.B. Stelzig, Assistant Federal Public Defender, respectfully moves this Honorable Court for an order placing under the Court's seal the Proposed Sealed Document (Memorandum in Support of Motion for Compassionate Release), and attached exhibits, to be filed today by the Defendant in this case. In support of this Motion, the Defendant states as follows:

1. The Memorandum in Support of Motion for Compassionate Release and exhibits contain confidential personal information including health information regarding Mr. Pho which is highly sensitive and confidential.
2. No reasonable alternatives to sealing the document are available. Deletion or expungement of sensitive portions of the document would render the submission substantially unreadable and would compromise counsel's ability to convey important information relevant to this case.
3. Counsel intends to serve the government with copies of this Memorandum in Support of Motion for Compassionate Release and attached exhibits.

WHEREFORE, Defendant respectfully requests that the Memorandum in Support of Motion for Compassionate Release and related exhibits to be filed immediately following this motion be placed under the Court's seal.

Respectfully submitted,

JAMES WYDA
Federal Public Defender
for the District of Maryland

June 9, 2020

/s/

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